

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

VANESSA BANDRICH,

Defendant.

12 Cr. 934 (RA)

The Hon. Ronnie Abrams

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed of Sean M. Maher, Esq., the accompanying memorandum of law, the indictment and all prior proceedings and pleadings had herein, the defendant, Vanessa Bandrich, by her attorney, Sean M. Maher, Esq., will move this United States District Court for the Southern District of New York before the Honorable Ronnie Abrams, on September 27, 2013, at the United States District Courthouse, Southern District of New York, 500 Pearl Street, New York, New York for the following relief:

1. An order pursuant to the Fourth, Fifth, and Sixth Amendments to the Constitution suppressing any evidence derived as a consequence of the search of the law firm of Bandrich and Associates;
2. An order permitting Ms. Bandrich to join in the motions of her co-defendants in so far as they are not inconsistent with the motions advanced herein and so far as the motions are applicable to Ms. Bandrich; and
5. For such other and further relief which this Court may deem just and proper.

Dated: August 9, 2013
New York, New York

Respectfully submitted,

/S/
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